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February 15, 2023

VIA ECF

Honorable Colleen McMahon  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: O'Neil v. Hadid, 1:22-cv-10711 (CM) (GWG)

MEMO ENDORSED  
2/15/2023  
Extension granted.  
Conference adjourned.

*Colleen McMahon*

Dear Judge McMahon:

We represent Plaintiff Robert O'Neil in the above-captioned case. We write pursuant to section I.D. of the Court's Individual Practice and Fed.R.Civ.P. 4(m) to respectfully request a 30-day extension of time to effectuate service of the summons and complaint upon defendant Isabella Khairiah "Bella" Hadid ("Defendant") and to adjourn the initial case management conference scheduled for February 23, 2023 at 10:00 a.m. [Dkt. No. 8] until such time as Defendant has been served and filed a notice of appearance. If the Court grants this request, the new requested service deadline would be April 19, 2023.

By way of background, the complaint was filed on December 20, 2022 [Dkt. No. 1]. Service must therefore be effectuated by March 20, 2023. Despite best efforts, Plaintiff has been unable to serve Defendant, a celebrity, at her last known residential apartment address in New York after four attempts were made through January 24, 2022. An Affidavit of Due Diligence is filed concurrently herewith. Plaintiff intends to make another round of attempts if the Court grants the present request. Thereafter, if Defendant cannot be found via personal service, Plaintiff will ask the Court for leave to serve Defendant via alternate means, such as through her social media accounts.

As Defendant has yet to appear, she neither consents to nor opposes the instant request. Plaintiff thanks the Court for its consideration.

Respectfully Submitted,

s/**jameshfreeman**/  
James H. Freeman

*Counsel for Plaintiff*